

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Amanda Braatz, individually and on)	
behalf of all others similarly situated,)	
)	
Plaintiff,)	
)	
v.)	No. 11 C 3835
)	
Leading Edge Recovery Solutions, Inc.,)	Judge Shadur
an Illinois limited liability company, and)	
LVNV Funding, LLC, a Delaware limited)	
liability company,)	
)	
Defendants.)	

MOTION TO AWARD ATTORNEYS' FEES AND COSTS

Class Counsel hereby submits this motion, pursuant to F.R.C.P. Rules 23(h) and 54(d)(2), to award attorneys' fees and costs for the litigation of this matter. In support of this motion, Class Counsel states:

1. The Class Action Complaint in this matter was filed on June 6, 2011, and an Amended Class Action Complaint was filed on June 7, 2011.
2. The Settlement Agreement, dated August 23, 2012, provided that the Defendants are to pay Class Counsel's attorneys' fees and costs in an amount to be negotiated between the parties, subject to approval by this Court, or in the amount awarded by this Court in a contested fee petition.
3. Class Counsel provided their detailed fee and expense records to Defendants' Counsel and, after negotiations, Defendants have agreed to pay \$53,000 to resolve Class Counsel's fees and costs in this action.
4. Accordingly, attached as Exhibit A is the Declaration of Class Counsel, which shows that they have incurred more than \$69,486.41 in fees and costs in

prosecuting this matter on behalf of Plaintiff and the Class. Philipps & Philipps, Ltd.'s contemporaneous time and expense records for the work in this matter are attached to the Declaration as Exhibit 1.

5. Accordingly, Class Counsel requests that the Defendants' agreement to pay \$53,000 to resolve the attorneys' fees and costs in this matter be approved, and that Class Counsel be awarded \$53,000, pursuant to the attached detail time and expense records.

WHEREFORE, Class Counsel hereby requests that this Court award them \$53,000 for their attorneys' fees and costs.

Respectfully submitted,

By: /s/ David J. Philipps
Class Counsel

Dated: December 14, 2012

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CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2012, a copy of the foregoing **Motion To Award Attorneys' Fees and Costs** was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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